

OUTGONG LTR NO.

DCS ORDER # 4700.1
95RF08146
**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment


000059651

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October 24, 1995

95-RF-08146
95-RM-ER-015-DOE
 C. L. Row
Site Support & Security
DOE, RFFO

 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM / FEDERAL FACILITY COMPLIANCE
AGREEMENT QUARTERLY PROGRESS REPORT - SAM-104-95


Action: Submit Third Quarter Progress Report to the U.S. Environmental Protection Agency

Attached is the Third Quarter 1995 Quarterly Progress Report as required under Section V.C. of the National Pollutant Discharge Elimination System (NPDES) Federal Facility Compliance Agreement (FFCA). This report includes a proposed strategy for closure of the remaining FFCA activities and reporting requirements. An extra copy of the report and a sample transmittal letter is included for your use in submittal to the U. S. Environmental Protection Agency.

Accomplishment of this task prior to October 27, 1995 closes out external milestone 00400, Submittal of Third Quarter FY96 Progress Report, in Work Package #12384.

If you require further information, please contact me at extension 2325 or Frank Rukavina at extension 7370.

 RMRS Records ✓
RECORDS CTR (2) X X
CORRES. CONTROL X X
ADMIN RECORD/080
ETRM TRACKING
TRAFFIC
PATS/T130G


S. A. Marshall, Team Lead
Sitewide Surface Water

FR:dql

Orig. & 1 cc - C. L. Row

 Attachment:
As Stated

 CC:
G. H. Setlock - Kaiser-Hill, L.L.C.

CLASSIFICATION

 UCN
UNCLASSIFIED X X
CONFIDENTIAL
SECRET

 AUTHORIZED CLASSIFIER
SIGNATURE

 DOCUMENT CLASSIFICATION
REVIEW WAIVER PER

DATE CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO:

NA

ACTION ITEM STATUS

PARTIAL OPEN

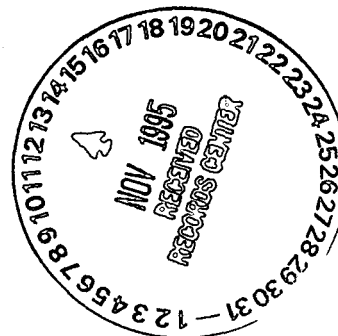
X CLOSED

LTR APPROVALS: 

ORIG & TYPIST INITIALS

FR dql

22.015.F



ADMIN RECCRD

SW-A-004213

1/12

NPDES FFCA
THIRD QUARTER 1995
PROGRESS REPORT

Attachment 1
95-RM-ER-015-DOE

October 27, 1995

REPORT NUMBER 22

The NPDES Federal Facilities Compliance Agreement (FFCA) Section V.C.1 requires quarterly progress reports to be submitted to EPA within 28 days after the end of the quarter. This report is submitted in response to that requirement, and covers activities during the period July 1 through September 30, 1995.

FFCA Item	Required Action	Due Date	Status
FFCA Effective Date		March 25, 1991	Complete. Signed by DOE Rocky Flats Office, March 19, 1991. Signed by EPA Region VIII, March 25, 1991.
Effluent Limitations (Sect. I)	Effluent limitations for Outfall 001 apply at the STP discharge rather than Pond B-3. Chromium limitations at Outfalls 005, 006, and 007.	April 1, 1991	Complete. Monthly reporting was modified to incorporate revised effluent monitoring requirements. These changes were implemented beginning with the April 1991 Discharge Monitoring Report (DMR).
Effluent Monitoring (Sect. II)	Monitoring of STP effluent for volatile organic compounds and metals. Whole Effluent Toxicity (WET) monitoring of the STP effluent, and A-4, B-5, and C-2 pond discharges.	June 30, 1990	Complete. Monthly reporting has been modified to incorporate revised effluent parameters and monitoring requirements. These changes were implemented beginning with the April 1991 DMR. Data collected in good faith prior to the signing of the FFCA, between June 1, 1990 and March 30, 1991, were summarized and included with the Progress Report submitted for fourth quarter 1991. Whole Effluent Toxicity (WET) testing of the STP and the terminal ponds was decreased from monthly sampling and analyses to quarterly sampling and analyses per the September 1, 1992 letter to James Hartman signed by Glenn Rodriguez, EPA Region VIII. Quarterly WET testing of the STP and terminal ponds was implemented October 1, 1992.
Compliance Plan (Sect. III.A)	Submit a Compliance Plan to EPA to include a diagnostic evaluation of the STP, instrumentation upgrades, sludge drying bed improvements, and influent/effluent containment provisions.	July 30, 1990	Complete. Implementation of the Compliance Plan has been initiated (see following).

FFCA Item	Required Action	Due Date	Status
Compliance Plan (Sect. III.A - continued)	Influent Instrumentation to monitor pH, conductivity, and other STP influent parameters (Compliance Plan Sect.II.A.1)	May 1990	Complete.
	Autochlorination/ Dechlorination (Compliance Plan Sect.II.A.2)		Complete.
	Instrumentation to include a Parshall flume, backwash control for sand filters, dissolved oxygen for aeration basin and additional effluent monitoring controls (Compliance Plan Sect.II.A.3)	December 1991	Complete.
	STP Facility Upgrades Phase I Drying Beds Capacity Improvements (Compliance Plan Sect II.B)	October 1992	Complete.
	STP Facility Upgrades Phase II Miscellaneous utility, equipment and facility upgrades (Compliance Plan Sect.II.C) STP Facility Upgrades Phase III Influent/effluent containment, nitrification/denitrification (Compliance Plan Sect.II.C)	Baseline Completion: October 1992 Forecast Completion: April 1996 TBD based on NPDES permit development	Design engineering was completed in December 1994, the construction contract was awarded in April 1995, and construction commenced in May 1995. The project's forecasted construction completion date is now April 1996. A solicitation was issued on October 3, 1995 for a Design-Build subcontract for Influent/effluent storage tanks. Contract award is anticipated in November 1995; completion of construction is anticipated prior to regulatory agency requirement as defined in the Industrial Area IM/IRA. The nitrification/denitrification portion of the project was canceled because the unionized ammonia standard for the Walnut Creek drainage on plant site was eliminated.
	Perform a diagnostic evaluation of the STP and implement operational recommendations (Compliance Plan Sect.II.D)		Complete.

FFCA Item	Required Action	Due Date	Status
Chromic Acid Incident Plan (Sect. III.B)	Submit a Chromic Acid Incident Plan (CAIP) to EPA addressing the findings of the Report of the Chromic Acid Incident at RFETS	November 15, 1990	Complete. Implementation of the CAIP has been initiated (see following).
	Tank Management Plan (CAIP Sect.1.1)	Baseline Completion: November 30, 1995 Forecast Completion: November 30, 1996	The Tank Management Plan is an above ground tank inspection and testing program. An initial inventory of 2685 tanks was completed September 15, 1994. The Master Tank Database currently contains a total of 2812 tanks. The initial testing and inspection cycle began as scheduled on December 1, 1992 and was scheduled to complete November 30, 1996. To date, 2476 tanks have received a visual inspection and 1302 received ultrasonic testing (UT). The UT data is lower than reported in the second quarter progress report due to data loss during personnel transition. Although the FY96 budget has not been finalized, funding has not been appropriated for the TMP and a Stop Work Order was issued October 1, 1995. Funding for tank integrity assessments is being evaluated with the intent to transfer responsibility to the operations areas (see attachment).
	Tank Surveillance Program (CAIP Sect. 1.2)	December 22, 1992	Complete.
	Instrumentation Development (CAIP Sect.2.0)		<u>Respirometer</u> . Complete. <u>Microtox Toxicity Test</u> . Complete. <u>Telemetry and Water Quality Reporting</u> . Complete. Remote monitoring equipment located at ten sites has been collecting and reporting water quality and surface water flow data for over 51 months. Data is used to supplement regulatory reporting requirements for the DMR and the NPDES monthly reports for flow discharge.
	Geotechnical Evaluation of the B-5 Dam Structure (CAIP Sect.3.0)	August 31, 1993	Complete.
	Drain Identification Study (CAIP Sect.4.0)	Baseline Completion: March 31, 1996 Forecast Completion: October 30, 1997	The Drain Identification Study is a source control program conducted in buildings which contain inappropriate sources of influent to the sanitary sewer system. Field evaluations are ongoing and currently have been started in 99 of the Sites 196 buildings, and have been completed in 68. The attached proposal to revise the scope of the DIS will allow completion during FY96 and was prepared for regulatory agency consideration. The rescope will delete low risk buildings from the study and exclude tracking chemicals of concern.
Groundwater Monitoring Plan for the Sludge Drying Beds (Sect. IV.C)	Submit a groundwater monitoring plan to EPA for the area beneath the STP sludge drying beds.	July 30, 1990	Complete.

RESCOPE OF THE REMAINING ACTIVITIES REQUIRED UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM FEDERAL FACILITIES COMPLIANCE AGREEMENT

The activities required by the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA) have been rescope to accelerate their completion. Since most of the FFCA requirements have been implemented or are closed, DOE recommends the expeditious completion of the three remaining activities required by the FFCA and conclusion of the agreement during FY96. DOE further requests that the language regarding FFCA activities be removed from the draft NPDES permit.

FFCA Activities

The FFCA requires the development and implementation of three remedial action plans; (1) the Ground Water Monitoring Plan, (2), Upgrades to the Waste Water Treatment Plant (referred to as the Sewage Treatment Plant (STP)), and (3) the Chromic Acid Incident Plan (CAIP). The current status of the three plans is as follows:

Ground Water Monitoring Plan

All components of the Ground Water Monitoring Plan have been completed.

Sewage Treatment Plant Upgrades

Six of seven components of the STP Upgrades are complete and implemented. The remaining activities; Phase II, facility upgrades, is scheduled for completion April 1996 and Phase III, Influent/effluent tanks, are on schedule to meet regulatory agency requirements contained in the Industrial Area IM/IRA.

Chromic Acid Incident Plan

Four of the six components of the CAIP have been completed. The remaining two activities are the Drain Identification Study (DIS) and the Tank Management Plan (TMP). Recent funding constraints have required reevaluation of the scope of these programs. The following sections detail the proposed changes to the DIS and TMP which will fulfill the original objective of the CAIP.

Drain Identification Study

Under the terms and conditions of the NPDES FFCA, the DOE conducted the DIS at the Rocky Flats Environmental Technology Site (Site) to address potential releases of hazardous materials to the Site's wastewater treatment plant. DOE proposes completing the DIS during FY96 through a reduction in scope which will support the intent of the CAIP.

A walkthrough of the remaining buildings was conducted by Site personnel in September, 1995, to identify those buildings which were considered moderate to high risk potential for release of hazardous materials into the sanitary waste system, and those buildings which were considered the least risk. Buildings identified as moderate to high risk will remain on the list for inspection by the DIS team, while those with low risk will be removed from the list with no further action required. The result of the assessment determined that of the 97 buildings remaining on the current DIS list, only 25 require inspection, while 68 are low risk and will be removed from the list.

Four buildings were not located at the time of the evaluation and probably no longer exist; however, if they are located they will be evaluated for inclusion in the study.

Accordingly, the final phase of the DIS program will be limited to the 25 remaining high risk buildings. When completed, a total of 124 buildings will have been inspected under the DIS program. The inspections will include field work, pathways evaluation and risk management, dye testing performed as required, and a final report for each building.

Summary of the Drain Identification Study

Buildings Completed and In Progress	99	
<u>Buildings Scheduled for Drain Investigations</u>	<u>25</u>	
Total Buildings Included in the DIS	124	
Buildings Excluded from Investigation List		68
<u>Buildings not located at the time of evaluation</u>	<u></u>	<u>4</u>
Total Buildings excluded from the DIS		72
Total Buildings at the Site		196

Tank Management Plan

The TMP completed an inventory of all tanks on Site and has completed 88% of the initial integrity testing at the end of fiscal year 1995. Because of funding constraints, no further programmatic tank inspections will be conducted. Control and authority over the existing tanks and the responsibility for routine integrity assessments are now the building owners.

DOE proposes the FFCA requirements of the TMP be terminated during FY96. Future tank inspections will be funded and coordinated by operations area management. Closure activities are contemplated in FY96 including a summary report, transfer of the database to configuration control, and disposition of program material. The TMP has the following accomplishments and deficiencies:

Accomplishments:

- Level 1 Procedure in place requiring routine surveillance of tanks for leaks or spills
- Tank Inventory Completed
- Database System implemented and maintained with current information
- Visual Inspection and non-destructive testing completed on over 88% of the Site's aboveground tanks

Deficiencies:

- Initial testing and inspection cycle not complete: 336 tanks remaining
- No coordinated system in place to continue non-destructive testing of remaining tanks

STP Upgrades

Sewage Treatment Plant Upgrades Phase II is continuing as scheduled and is forecast for completion in April 1996. The Influent/Effluent storage tanks will continue as scheduled to completion prior to regulatory agency requirement as identified in the Industrial Area IM/IRA.

Quarterly Progress Reporting

In the spirit of paperwork reduction, after transmittal of this NPDES FFCA Third Quarter 1995 Progress Report, future progress reports will be transmitted biannually until completion of the DIS, TMP and STP Upgrades Phase II. The last report is expected October 25, 1996.

DRAIN IDENTIFICATION STUDY BUILDING STATUS

LEGEND:

STATUS

- C/I Buildings completed or in process
- EXC Excluded from Drain Identification Study
- TBI To be inspected
- O Others, e.g., buildings not located at time of evaluation

GRP

Group number formula is based on potential risk and/or projected significant impact on other RFP programs.

	GRP	BLDG.	PRIMARY USE	STATUS	SQ. FT.	POTENTIAL HAZARD
1	1	701	MAINTENANCE	C/I	5,180	PILOT BUILDING, No Known Risk
2	1	910	REVERSE OSMOSIS	C/I	9,066	Solar Ponds
3	1	444	MANUFACTURING	C/I	181,980	Economic Development, U, Be
4	1	445	CARBON STORAGE	C/I	3,200	Carbons
5	1	447	MANUFACTURING	C/I	23,100	Economic Development, Uranium
6	1	448	STORAGE	C/I	2,550	Uranium
7	1	865	MATERIAL & PROCESS DEVELOPMENT	C/I	37,980	Economic Development, 1 RQ of Oil
8	1	374	PROCESS WASTE TREATMENT	C/I	62,787	Process Waste & 10 RQ'S of Nitric Acid
9	1	771	PLUTONIUM RECOVERY FACILITY	C/I	151,133	Plutonium
10	1	771 B	CARPENTER SHOP	C/I		Connected to 771
11	1	771 C	NUCLEAR WASTE PACKAGING	C/I		Nuclear Waste
12	1	774	WASTE TREATMENT PLANT	C/I	25,060	Solvent 55 Gal & Acids
13	1	371	PLUTONIUM RECOVERY	C/I	300,000	Plutonium
14	1	559	PLUTONIUM ANALYTICAL LAB	C/I	32,890	Plutonium
15	1	707	MANUFACTURING	C/I	197,770	Plutonium
16	1	778	SERVICES	C/I	31,220	RCA Locker Rm., Paints
17	1	776	MANUFACTURING	C/I	156,200	Plutonium
18	1	777	ASSEMBLY	C/I	74,820	General Chemicals
19	1	779	PLUTONIUM DEVELOPMENT	C/I	64,790	Plutonium
20	1	883	ROLLING & FORMING	C/I	60,500	Economic Development, U & Oils
21	1	991	PRODUCT WAREHOUSE	C/I	37,880	Plutonium
22	1	886	NUCLEAR SAFETY FACILITY	C/I	10,380	Plutonium
23	1	987	STORAGE VAULT	C/I	64	Plutonium
24	1	996	STORAGE VAULT	C/I	120	Plutonium
25	1	997	STORAGE VAULT	C/I	1,035	Plutonium
26	1	998	STORAGE VAULT	C/I	690	Plutonium

DRAIN IDENTIFICATION STUDY BUILDING STATUS

	GRP	BLDG.	PRIMARY USE	STATUS	SQ. FT.	JUSTIFICATION
27	1	999	STORAGE VAULT	C/I	384	Plutonium
28	1	123 A	HAZARDOUS WASTE STORAGE	C/I	135	Plutonium & Waste
29	2	123	HEALTH PHYSICS	C/I	18,580	Many RQ's of Many Items
30	2	708	COMPRESSOR	C/I	7,460	1 RQ of Oil
31	2	515	SUBSTATION NO. 5	C/I	225	200 + Gal Oil
32	2	516	SUBSTATION NO. 6	C/I	225	200 + Gal Oil
33	2	517	SUBSTATION NO. 7	C/I	270	200 + Gal Oil
34	2	518	SUBSTATION NO. 8	C/I	270	200 + Gal Oil
35	2	555	SUBSTATION NO. 2	C/I	450	200 + Gal Oil
36	2	681	SUBSTATION NO. 1	C/I	90	200 + Gal Oil
37	2	675	SUBSTATION NO. 3	C/I	378	200 + Gal Oil
38	2	253	SWITCHGEAR	C/I	500	200 + Gal Oil
39	2	551	GENERAL WAREHOUSE	C/I	44,140	40 RQ's of Calcium Hypochlorite
40	2	788	CEMENTATION PROCESS	C/I	2,394	15 RQ's of Calcium Chloride
41	2	443	HEATING PLANT	C/I	18,608	12 RQ's of Sodium Hydroxide
42	2	867	FILTER PLENUM (W OF 865)	C/I	405	10 RQ's of Calcium Hypochlorite
43	2	715	EMERGENCY GENERATOR (771,774)	C/I	700	Oils & 10 RQ's of Calcium Hypochlorite
44	2	124	WATER TREATMENT PLANT	C/I	12,310	4 RQ's OF Calcium Hydpochlorite
45	2	702	PUMP HOUSE (712)	C/I	980	1 RQ of Oil
46	2	554	STORAGE & SHIPPING	C/I	1,180	1 RQ of Oil
47	3	566	PROTECTIVE CLOTHING DECONTAMINATION	C/I	5,400	Plutonium Access
48	3	889	EQUIPMENT DECONTAMINATION	TBI	3,260	Plutonium Access
49	3	732	LAUNDRY WASTE PIT (778)	EXC	64	Plutonium Access
50	3	729	FILTER PLENUM (779)	C/I	2,740	Plutonium Access
51	3	782	FILTER PLENUM (779)	C/I	6,200	Plutonium Access
52	3	561	FILTER PLENUM	C/I	5,660	Plutonium Access
53	3	868	FILTER PLENUM (E OF 865)	C/I	405	Plutonium Access
54	3	875	FILTER PLENUM (886)	C/I	3,902	Plutonium Access
55	3	731	PROCESS WASTE PIT (707)	EXC	144	Plutonium Access
56	3	728	PROCESS WASTE PIT (771)	TBI	484	Plutonium Access
57	3	730	PROCESS WASTE PIT (776)	TBI	120	Plutonium Access
58	3	528	PROCESS WASTE PIT (559)	C/I	200	Plutonium Access
59	4	125	STANDARDS LABORATORY	C/I	16,440	Trichloroethylene & Oils
60	4	373	COOLING TOWER	C/I	1,764	Sulfuric Acid 1/4 RQ
61	4	122	MEDICAL	C/I	9,120	Potential Pu, etc.

DRAIN IDENTIFICATION STUDY BUILDING STATUS

	GRP	BLDG.	PRIMARY USE	STATUS	SQ. FT.	JUSTIFICATION
62	5	879	FILTER PLENUM (883)	C/I	810	Uranium Access
63	5	450	FILTER PLENUM (S OF 444)	C/I	2,500	Uranium & Be Access
64	5	455	FILTER PLENUM (444 PLATING)	C/I	184	Uranium Access
65	5	451	FILTER PLENUM (S OF 447)	C/I	625	Uranium Access
66	6	881 F	MANUFACTURING & GENERAL SUPPORT	EXC		Acids & Ammoniums
67	6	772 A	ACID STORAGE (SE OF 771)	O	50	Acids
68	6	881	MANUFACTURING & GENERAL SUPPORT	C/I	245,200	Acids & Ammoniums
69	6	381	FLUORINE	TBI	1,320	Fluorine
70	6	772	FLUORINE STORAGE	C/I	410	Fluorine
71	6	988	TERTIARY TREATMENT PUMP	C/I	1,225	Ammonium Sulfates
72	6	442	FILTER TEST LAB & STORAGE	C/I	7,480	Bacteria Enzymes Alive
73	6	714	HF STORAGE	C/I	625	Hydrofluoric Acid
74	6	703	PUMP HOUSE (713)	C/I	1,140	Sulfuric Acid 1/3 of RQ
75	6	764	PIDAS DATA COLLECTION	C/I	1,617	Batteries & Some Paint
76	6	830	ISOLATED POWER SUPPLY (881)	C/I	184	Batteries
77	6	331	GARAGE & FIRE STATION	C/I	23,540	Battery Acid & Oils
78	7	828	PROCESS WASTE PIT (881)	EXC	84	Hazardous Waste
79	7	868	PROCESS WASTE TRANSFER	EXC	324	Waste
80	7	770	WASTE DRUM STORAGE	C/I	1,140	Waste
81	7	429	PROCESS WASTE PIT (441)	O	225	Waste Waters
82	7	887	SEWAGE & PROCESS WASTE LIFT	C/I	1,555	Process Waste
83	7	664	WASTE STORAGE & SHIPPING	C/I	17,393	Waste & Paints
84	8	439	MOD CENTER/MACHINE SHOP	TBI	5,140	Oils & Solvents
85	8	440	MOD CENTER	EXC	34,320	Oils & Solvents
86	8	334	MAINTENANCE	C/I	42,950	Oils & Solvents
87	8	449	OIL & PAINT STORAGE	C/I	2,440	Oil & Paint
88	8	885	PAINT & OIL STORAGE	TBI	225	Oil & Paint
89	8	441	PRODUCTION SUPPORT	EXC	17,790	Developers
90	9	111	ADMINISTRATION	TBI	44,046	Photo Lab
91	9	333	PAINT SHOP & SAND BLAST	C/I	3,060	Paints
92	9	705	COATING LAB	TBI	4,186	Paints
93	9	223	NITROGEN SUPPLY FACILITY	C/I	1,140	Paints, Oil in small amounts
94	9	553	WELDING SHOP	C/I	1,280	Paints
95	10	863	ELECTRICAL TRANSFORMER	TBI	225	Oils
96	10	556	METAL CUTTING	TBI	225	Oils

DRAIN IDENTIFICATION STUDY BUILDING STATUS

	GRP	BLDG.	PRIMARY USE	STATUS	SQ. FT.	JUSTIFICATION
97	10	128	VEHICLE SHELTER	EXC	690	Oils
98	10	453	OIL STORAGE	C/I	384	Oils
99	10	460	CONSOL. NON-NUC. MANUFACTURING	TBI	230,000	Oils
100	10	989	EMERGENCY GENERATOR (991)	C/I	258	Oils
101	10	377	AIR COMPRESSOR	EXC	21,048	Oils
102	10	727	EMERGENCY GENERATOR (782)	C/I	384	Oils
103	10	127	EMERGENCY GENERATOR	TBI	500	Oils
104	10	427	EMERGENCY GENERATOR (444)	C/I	312	Oils
105	10	562	EMERGENCY GENERATOR (561)	EXC	380	Oils
106	10	827	EMERGENCY GENERATOR (865, 875, 883 & 886)	TBI	380	Oils
107	10	428	WASTE COLLECTION PUMP	TBI	450	Oils
108	10	231	PUMP HOUSE	C/I	225	Oils
109	10	750	PRODUCTION ENGINEERING SUPPORT	EXC	57,170	Some Paints
110	11	985	FILTER PLENUM (966, 997 & 999)	C/I	4,720	No Known Risk
111	11	965	STORAGE	EXC	1,406	Storage
112	11	964	STORAGE	TBI	1,794	Storage
113	11	880	STORAGE	EXC	800	Storage
114	11	884	WAREHOUSE	TBI	3,240	Storage
115	11	663	STORAGE & SHIPPING	EXC	3,600	Storage
116	11	666	STORAGE	TBI	486	Storage
117	11	126	SOURCE STORAGE	TBI	140	No Known Risk
118	11	130	PRODUCTION SUPPORT & WAREHOUSE	TBI	81,100	Repro & Warehouse
119	11	968	CONTRACTOR WAREHOUSE	EXC	6,400	Storage
120	12	682	PLANT POWER	EXC	810	No Known Risk
121	12	575	POWER STATION	C/I	450	No Known Risk
122	12	780	FLAMMABLE STORAGE	EXC	450	No Known Risk
123	13	709	COOLING TOWER	EXC	1,260	No Known Risk
124	13	711	COOLING TOWER	EXC	968	No Known Risk
125	13	712	COOLING TOWER	EXC	780	No Known Risk
126	13	713	COOLING TOWER	EXC	555	No Known Risk
127	13	718	COOLING TOWER	C/I	176	No Known Risk
128	13	784	COOLING TOWER	EXC	243	No Major Hazard Potential
129	13	785	COOLING TOWER	EXC	64	No Major Hazard Potential
130	13	786	COOLING TOWER	EXC	243	No Major Hazard Potential
131	13	787	COOLING TOWER	EXC	176	No Major Hazard Potential

DRAIN IDENTIFICATION STUDY BUILDING STATUS

	GRP	BLDG.	PRIMARY USE	STATUS	SQ. FT.	JUSTIFICATION
132	13	890	COOLING TOWER	EXC	220	No Known Risk
133	13	563	COOLING TOWER	EXC	100	No Known Risk
134	13	560	COOLING TOWER	EXC	100	No Known Risk
135	13	454	COOLING TOWER	C/I	432	No Known Risk
136	13	457	COOLING TOWER	C/I	120	No Known Risk
137	13	462	COOLING TOWER	EXC	81	No Known Risk
138	13	783	PUMP, TOWER WATER (779)	EXC	324	No Major Hazard Potential
139	14	952	ISOLATED GAS STORAGE	C/I	98	No Known Risk
140	14	552	GAS STORAGE	TBI	4,170	No Known Risk
141	14	966	ELECTRICAL & PLUMBING SHOP	O	3,100	No Known Risk
142	14	710	STEAM VALVE HOUSE	C/I	120	No Known Risk
143	14	61	WAREHOUSE	TBI	58,200	No Known Risk
144	14	869	GAS METER HOUSE	TBI	400	No Known Risk
145	14	668	DRUM CERTIFICATION	EXC	1,040	No Known Risk
146	14	780 B	GAS BOTTLE STORAGE	EXC	120	No Known Risk
147	14	775	SEWAGE LIFT STATION	EXC	70	No Known Risk
148	15	980	CONTRACTOR METAL SHOP	TBI	13,130	No Known Risk
149	15	335	FIRE TRAINING	EXC	2,180	No Known Risk
150	15	765	SECONDARY ALARM CENTER	C/I	960	No Known Risk
151	15	378	PUMP HOUSE (808)	EXC		No Known Risk
152	15	129	RAW WATER STRAINER	EXC	225	No Known Risk
153	15	549	ALARM SYSTEMS OFFICES	C/I	1,920	No Known Risk
154	15	569	CRATE COUNTER	EXC	2,280	No Known Risk
155	15	882	GAS CYLINDERS STORAGE	EXC	120	No Known Risk
156	15	928	FIRE WATER PUMP	C/I	504	No Known Risk
157	16	995	SEWAGE TREATMENT FACILITY	C/I	600	No Known Risk
158	16	967	CONTRACTOR LOCKER ROOM	O	8,000	No Known Risk
159	16	993	SECURITY STORAGE	C/I	690	No Known Risk
160	16	984	SHIPPING CONTAINER STORAGE	EXC	5,000	No Known Risk
161	16	570	CRATE COUNTER SUPPORT	EXC	432	No Known Risk
162	16	780 A	METAL STORAGE	EXC	64	No Known Risk
163	16	367	STORAGE SHED	EXC	414	No Known Risk
164	16	112	CAFETERIA	EXC	9,280	No Known Risk
165	17	762	GUARD POST (CENTRAL & 9TH)	EXC	120	No Known Risk
166	17	773	GUARD POST	EXC	190	No Known Risk

DRAIN IDENTIFICATION STUDY BUILDING STATUS

GRP	BLDG.	PRIMARY USE	STATUS	SQ. FT.	JUSTIFICATION
167	17	782	GUARD POST (N OF 771)	EXC	64 No Known Risk
168	17	762 A	PERSONNEL ACCESS CONTROL (707)	EXC	900 No Known Risk
169	17	792 A	PERSONNEL ACCESS CONTROL (771)	EXC	900 No Known Risk
170	17	372 A	PERSONNEL ACCESS CONTROL (371)	EXC	1,725 No Known Risk
171	17	372	GUARD POST	EXC	225 No Known Risk
172	17	900	GUARD POST (E GATE)	C/I	320 No Known Risk
173	17	920	GUARD POST (E ACCESS)	C/I	447 No Known Risk
174	17	992	GUARD POST	C/I	64 No Known Risk
175	17	864	GUARD POST	EXC	1,160 No Known Risk
176	17	888	GUARD POST	EXC	144 No Known Risk
177	17	557	GUARD POST	EXC	225 No Known Risk
178	17	446	GUARD POST	EXC	299 No Known Risk
179	17	461	GUARD POST	EXC	225 No Known Risk
180	17	100	GUARD POST (W GATE)	C/I	432 No Known Risk
181	17	113	GUARD POST	EXC	324 No Known Risk
182	17	120	GUARD POST (W ACCESS)	EXC	447 No Known Risk
183	17	131	PERSONNEL & ACCESS CONTROL	EXC	22,000 No Known Risk
184	18	706	LIBRARY	EXC	4,000 No Known Risk
185	18	564	PRE-ENGINEERED BLDG	EXC	3,000 No Known Risk
186	18	850	LOGISTICS	EXC	1,37,000 No Chemical Tracking
187	18	376	PRE-ENGINEERED BLDG	EXC	3,000 No Known Risk
188	18	122 S	SHREDDER SHED	C/I	100 No Known Risk
189	18	115	DOE & EOC	TBI	17,000 No Known Risk
190	18	119	PLANT SECURITY	EXC	11,200 No Known Risk
191	18	121	PLANT PROTECTION	EXC	10,654 No Known Risk
192	18	452	PRE-ENGINEERED BLDG	EXC	6,000 No Known Risk
193	18	250	WIND SITE	EXC	22,500 No Known Risk
194	18	60	TRAINING FACILITY	EXC	30,787 No Known Risk
195		891	ACID BUILDING	TBI	
196		116	OFFICE	EXC	No Known Risk

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